

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-CR-10135-GAO
)	
THOMAS SCOLA,)	
FEDERICO NIVAR, and)	
JILL E. DOUCETTE)	
)	

GOVERNMENT'S ASSENTED TO MOTION TO EXCLUDE TIME

Now comes the United States, by its attorneys, Michael J. Sullivan, United States Attorney, and David G. Tobin, Assistant U.S. Attorney, and hereby moves to exclude from all Speedy Trial Act calculations the period of time from March 10, 2005 (the date of a scheduled Status Conference) to and including March 24, 2005 (the date of the next Status Conference) (excludable delay pursuant to 18 U.S.C. § 3161(h)(1)(F) and § 3161(h)(8)(A)). The requested delay is in the interests of justice and outweighs the best interests of the public and the defendants in a speedy trial. Defendants Scola and Nivar, through counsel, assented to this request at the Status Conference on March 10, 2005. Defendant Doucette's attorney was absent from the March 24, 2005 status hearing. The Court also put Defendant Doucette's case on for a status conference on March 24, 2005. The United States

moves to have the time between March 10, 2005 and March 24, 2005 excluded from the provisions of the Speedy Trial Act as it relates to Defendant Doucette.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ David G. Tobin
DAVID G. TOBIN
Assistant U.S. Attorney
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Dated: March 10, 2005